

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**JANE DOE 1, et al.,**

**Plaintiffs,**

**v.**

**BAYLOR UNIVERSITY,**

**Defendant.**

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**Civil Action No. 6:16-CV-00173-RP**

**Consolidated with  
6:17-CV-228-RP  
6:17-CV-236-RP**

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**JOINT MOTION TO EXTEND ORDER DEADLINES REGARDING THIRD-PARTY  
VENDOR AND PRODUCTION**

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The Court's June 21, 2019 Order (Dkt. 667) directed the parties to, among other things, (i) confer and select a third-party vendor and notify the Court by June 28, 2019<sup>1</sup> that a vendor had been hired, (ii) Pepper Hamilton to produce the materials responsive to the subpoena as referenced in the Order to the third-party vendor immediately upon the parties' notification to the Court that a vendor has been hired, and (iii) Pepper Hamilton to certify production of the materials responsive to the subpoena within the referenced time period by July 10, 2019. Dkt. 667 at 2-4.

The initial vendor identified by the parties last week was ultimately not selected. The parties have selected a replacement vendor, UnitedLex, and are working on the terms of the engagement agreement. Given the intervening July 4<sup>th</sup> holiday, the terms have not yet been finalized, but the parties expect the engagement agreement to be complete by July 12, 2019. The delay in engaging the third-party vendor will impact Pepper Hamilton's July 10, 2019 deadline to comply with the Order.

The parties therefore request that the Court (i) extend their deadline to complete the engagement of the third-party vendor, UnitedLex, to July 12, 2019 at which time they will file a Joint

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<sup>1</sup> The parties sought an extension of this deadline and the Court granted an extension to July 8, 2019. *See* June 28, 2019 Text Order.

Advisory confirming they have done so; (ii) extend the deadline for Pepper Hamilton to respond to the Subpoena pursuant to the Order (Dkt. 667) until immediately after the Joint Advisory is filed; and (iii) extend the deadline for Pepper Hamilton to certify to the Court that its production is complete from July 10, 2019 to 10 days after the Joint Advisory regarding third-party vendor is filed.

Some of the other deadlines in the Court's June 21 Order may be impacted by the extension of the date for the parties to finalize the terms of the engagement of the third-party vendor, but the parties are working to minimize that impact and will advise the Court as further needs for extensions may arise.

Since the entry of the Court's June 21 Order, counsel for the parties have been actively conferring on this matter. This motion is not brought for purposes of delay.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing motion was served upon all counsel of record on July 8, 2019, via the Court's ECF/CMF electronic service system as follows:

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